

March 24, 1993

DOCKET FILE COPY ORIGINAL

## Stanislaus County Fire Safety Department

RECEIVED

929 Oakdale Road Modesto, California 95355 Phone (209) 525-4650

APR = 2 1993 Russell D. Richards III, Fire Warden

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

RECEIVED

Ms. Donna Searcy, Secretary Federal Communications Commission

APR 1 1993

capability for the fire service, a service that makes daily use of mutual aid to meet its objectives. Any adverse impact to this system would be detrimental to our mission as well as a severe set back to public fire and life safety.

The elimination of service block frequency allocations will complicate an already complex system of coordination. With the proliferation of communications system needs in the public sector, APCO and IMSA currently have a tremendous responsibility to manage specific blocks of spectrum. This would be adversely affected by removing or substantially altering the management system now in place.

The individual, not to mention cumulative effects, of "Refarming" could be disastrous to local government agencies. Make no mistake that funding is not now present, nor does it appear that it will be in the future, to substantially retrofit, modify, or replace current equipment operated by the local fire service agencies in California.

Please register my opposition, and that of my agency, to the "Refarming" proposal currently under consideration by the Federal Communications Commission.

Respectfully submitted,

Russell D. Richards III

Fire Warden